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**VIA CM/ECF**

Honorable Valerie Figueredo  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Application Granted

Valerie Figueredo, U.S.M.J.

DATED: 10-28-2022

This will be the final stay for purposes of settlement negotiations given that this is the parties' third request. The parties are directed to submit a revised proposed case management plan and scheduling order by Friday, November 18, 2022. In addition, the parties are directed to submit a joint letter updating the Court on the status of settlement by Monday, November 21, 2022. If the parties have not reached settlement by that date, the parties will attend an in-person status conference on Tuesday, November 22, 2022 at 11:00 a.m., in Courtroom 17-A, United States Courthouse, 500 Pearl Street, New York, New York. **SO ORDERED.**

Re: IMG Memorial Fund I, LLC v. First Landing Fund, LLC, et al., Case No. 1:21-cv-3263-LGS - Joint Letter Requesting Further 21-day Extension of Stay of Proceedings

Dear Judge Figueredo:

We represent the First Landing Defendants and write jointly with counsel for all parties to request a further 21-day extension of the stay of proceedings in this action. On August 30, 2022, via memo endorsement, the Court granted the parties' letter request for a 30-day stay of proceedings as the parties explored settlement (ECF No. 107). On September 27, 2022, the Court granted the parties' letter request for a further, 30-day stay of proceedings (ECF No. 109). The discussion of potential settlement among the parties, which remains ongoing, has taken more time than anticipated. Accordingly, the parties respectfully request an additional 21-day extension of the stay of proceedings, through and including November 18, 2022. Should settlement discussions prove unfruitful, the parties will submit a revised proposed Case Management Plan and Scheduling Order no later than the expiration of the extended 21-day stay (on November 18, 2022), and should the parties' reach an agreement in principle, we will promptly notify the Court.

We thank the Court for its time and attention to this matter.

Respectfully submitted,

Marion R. Harris

cc: All Counsel (via CM/ECF)